

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

OCCUNET, LLC,

Plaintiff,

v.

PREMIER HEALTHCARE SOLUTIONS,
INC. AND TRPN DIRECT PAY, INC.,

Defendants.

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CASE NO. 2:25-cv-00039-Z-BR

**DEFENDANT TRPN DIRECT PAY, INC.’S UNOPPOSED
MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Defendant TRPN Direct Pay, Inc. (“TRPN”) respectfully files this Unopposed Motion for Leave to Proceed Without Local Counsel (the “Motion”) pursuant to Local Rule 83.10(a) and shows unto the Court as follows:

1. TRPN is represented by Brett D. Solberg of DLA Piper’s Houston and Austin offices, and Benjamin D. Schuman and Meagan M. Pace, of DLA Piper’s Baltimore, Maryland office.

2. TRPN is a Nevada corporation with its principal place of business in Nevada. OccuNet alleges one count against TRPN: tortious interference with a contract between OccuNet and Premier Healthcare Solutions, Inc. (a Delaware corporation) governed under the laws of the state of Delaware. *See* ECF No. 7, at ¶¶ 60-70. TRPN has no connection with or contacts in the Northern District of Texas, and has no relationship with local counsel physically located in this District.

3. Brett D. Solberg, counsel for TRPN, intends to enter his appearance in this matter in conjunction with the filing of TRPN's answer or other response to Plaintiff's Amended Complaint.

4. Mr. Solberg was admitted to the United States District Court for the Northern District of Texas on November 28, 2023, and has been a member in good standing since that date. Mr. Solberg has never been subject to any disciplinary proceedings. In addition to the Northern District of Texas, Mr. Solberg is also admitted in the Southern, Eastern, and Western Districts of Texas, the Western District of Oklahoma, and the United States Circuit Courts of Appeal for the First, Second, Third, Fifth, Seventh, and Ninth Circuits. Mr. Solberg has regularly practiced law in federal courts and, as a result, has substantial experience in litigating pursuant to the Federal Rules of Civil Procedure and the Local Rules for the Northern District of Texas.

5. Since Mr. Solberg was admitted to the State Bar of Texas in 2009, he has conducted work and participated in cases out of his firm's Dallas office, in the Northern District of Texas. Mr. Solberg resides in Houston and primarily works in Austin and Houston, Texas. Mr. Solberg certifies that the daily, two-hour, direct flights available from Houston to Amarillo mean he can quickly travel to the J. Marvin Jones Federal Building and can be available in-person to attend any hearing or conference set by the Court.

6. Attorneys Benjamin D. Schuman and Meagan M. Pace of Baltimore, Maryland are also counsel for TRPN and Mr. Solberg will move for their admission to this Court *pro hac vice* in this matter in conjunction with the filing of TRPN's response to Plaintiff's Amended Complaint.

7. Mr. Schuman has served as outside counsel for TRPN since 2023 and is familiar with the organization and its representatives. Mr. Schuman is admitted to practice in Maryland, the District of Columbia, the United States District Courts for the District of Maryland and the

District of Columbia, the United States Circuit Courts of Appeal for the Second and Fourth Circuits, and has been a member in good standing at all times for his admissions. Mr. Schuman regularly practices law in federal courts around the country and, as a result, has substantial experience in litigating pursuant to the Federal Rules of Civil Procedure. Mr. Schuman consistently makes himself available to travel for and attend in-person any hearing or conference set by courts. Mr. Schuman has familiarized himself with the Local Rules for the Northern District of Texas and is prepared to make all necessary travel arrangements to appear in court proceedings.

8. Ms. Pace is admitted to practice in Maryland and the United States District Court for the District of Maryland and has been a member in good standing at all times for her admission. Ms. Pace regularly practices law in federal courts around the country and, as a result, has substantial experience in litigating pursuant to the Federal Rules of Civil Procedure. Ms. Pace consistently makes herself available to travel for and attend in-person any hearing or conference set by courts. Ms. Pace has familiarized herself with the Local Rules for the Northern District of Texas and is prepared to make all necessary travel arrangements to appear in court proceedings.

9. Local Rule 83.10(a) allows a party to seek leave to proceed without local counsel. TRPN wishes to be represented by counsel with whom it is most familiar and comfortable, and Mr. Solberg, Mr. Schuman, and Ms. Pace are prepared to take all actions necessary to comport themselves with the requirements of this Court.

10. Before filing the instant Motion, TRPN's counsel conferred with Plaintiff's counsel and co-Defendant Premier Healthcare Solutions, Inc.'s counsel, both of whom stated they are unopposed to TRPN's request to proceed without local counsel.

11. For the foregoing reasons, TRPN and its counsel respectfully request that this Court grant TRPN, Mr. Solberg, Mr. Schuman, and Ms. Pace relief from the requirement of Local Rule 83.10(a) and grant leave to proceed without counsel.

WHEREFORE, PREMISES CONSIDERED, TRPN, Brett D. Solberg, Benjamin D. Schuman, and Meagan M. Pace pray that this Court grant leave to proceed without local counsel and such other further relief to which they are justly entitled.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

Dated: April 22, 2025

Respectfully submitted,

DLA PIPER LLP (US)

By: /s/ Brett D. Solberg

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Attorneys for Defendant
TRPN DIRECT PAY, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred via email with Plaintiff OccuNet, LLC's and co-Defendant Premier Healthcare Solution, Inc.'s counsel on April 22, 2025, regarding the foregoing document. By reply email on that same date, counsel for OccuNet and Premier stated that they are not opposed to the relief requested herein.

/s/ Meagan M. Pace

Meagan M. Pace

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on this day, April 22, 2025 via the Court's CM/ECF system.

/s/ Brett Solberg

Brett Solberg